

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

**WSOU INVESTMENTS, LLC D/B/A
BRAZOS LICENSING AND
DEVELOPMENT,**

Plaintiff,

v.

MICROSOFT CORPORATION,

Defendant.

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CIVIL ACTION NO. 6:20-cv-00454-ADA

CIVIL ACTION NO. 6:20-cv-00457-ADA

CIVIL ACTION NO. 6:20-cv-00460-ADA

CIVIL ACTION NO. 6:20-cv-00461-ADA

CIVIL ACTION NO. 6:20-cv-00463-ADA

CIVIL ACTION NO. 6:20-cv-00464-ADA

CIVIL ACTION NO. 6:20-cv-00465-ADA

**DECLARATION OF IRENE YANG IN SUPPORT OF DEFENDANT
MICROSOFT CORPORATION'S MOTION FOR RECONSIDERATION OF ITS
MOTION TO TRANSFER VENUE TO AUSTIN DIVISION**

I, Irene Yang, declare as follows:

1. I am an attorney with the law firm of Sidley Austin LLP, counsel for Defendant Microsoft Corporation (“Microsoft”) in this action. I submit this declaration in support of Microsoft’s Motion for Reconsideration of Its Motion to Transfer Venue to the Austin Division of the Western District of Texas in this litigation and the 6 other litigations filed by WSOU Investments, LLC (“WSOU”) against Microsoft on the same day. I have personal knowledge of the facts set forth in this declaration and, if called as a witness, could and would testify thereto.

2. Attached hereto as **Exhibit A** is a true and correct copy of excerpts from the Deposition of Matt Hogan, taken September 23, 2021. The cited portions of the excerpts have been highlighted for ease of reference.

3. Attached hereto as **Exhibit B** is a true and correct copy of Plaintiff’s Rule 26(a) Initial Disclosures, served March 24, 2021.

4. Attached hereto as **Exhibit C** is a true and correct copy of Plaintiff’s First Supplemental Rule 26(a) Disclosures, served November 15, 2021.

5. Attached hereto as **Exhibit D** is a true and correct copy of excerpts from the Deposition of Craig Etchegoyen, taken October 13, 2021. The cited portions of the excerpts have been highlighted for ease of reference.

6. Attached hereto as **Exhibit E** is a true and correct copy of excerpts from the Deposition of Stuart Shanus, taken October 15, 2021. The cited portions of the excerpts have been highlighted for ease of reference.

7. Attached hereto as **Exhibit F** is a true and correct copy of excerpts from the transcript of the telephonic discovery hearing held November 30, 2020. The cited portions of the excerpts have been highlighted for ease of reference.

8. Attached hereto as **Exhibit G** is a true and correct copy of a list of non-stop flights to and from Waco from the website of Waco Regional Airport, last visited on March 14, 2022.

9. Attached hereto as **Exhibit H** is a true and correct copy of a list of non-stop flights from Austin from the website www.austintexas.gov, last visited on March 14, 2022.

10. Attached hereto as **Exhibit I** is a true and correct copy of a Google Flights listing of available flights from Kailua-Kona, Hawaii to Waco, Texas, last visited on March 14, 2022.

11. Attached hereto as **Exhibit J** is a true and correct copy of a Google Flights listing of available flights from Kailua-Kona, Hawaii to Austin, Texas, last visited on March 14, 2022.

12. Attached hereto as **Exhibit K.1** is a true and correct copy of Defendant's Second Amended Initial Disclosures Pursuant to Fed. R. Civ. P. 26(A)(1), Civil Action No. 6:20-cv-00454, served September 30, 2021.

13. Attached hereto as **Exhibit K.2** is a true and correct copy of Defendant's Amended Initial Disclosures Pursuant to Fed. R. Civ. P. 26(A)(1), Civil Action No. 6:20-cv-00457, served August 30, 2021.

14. Attached hereto as **Exhibit K.3** is a true and correct copy of Defendant's Amended Initial Disclosures Pursuant to Fed. R. Civ. P. 26(A)(1), Civil Action No. 6:20-cv-00460, served August 23, 2021.

15. Attached hereto as **Exhibit K.4** is a true and correct copy of Defendant's Second Amended Initial Disclosures Pursuant to Fed. R. Civ. P. 26(A)(1), Civil Action No. 6:20-cv-00461, served January 13, 2022.


16. Attached hereto as **Exhibit K.5** is a true and correct copy of Defendant's Amended Initial Disclosures Pursuant to Fed. R. Civ. P. 26(A)(1), Civil Action No. 6:20-cv-00463, served August 30, 2021.

17. Attached hereto as **Exhibit K.6** is a true and correct copy of Defendant's Third Amended Initial Disclosures Pursuant to Fed. R. Civ. P. 26(A)(1), Civil Action No. 6:20-cv-00464, served March 15, 2022.

18. Attached hereto as **Exhibit K.7** is a true and correct copy of Defendant's First Amended Initial Disclosures Pursuant to Fed. R. Civ. P. 26(A)(1), Civil Action No. 6:20-cv-00465, served September 30, 2021.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on March 18, 2022 in San Francisco, California.

A handwritten signature in black ink, appearing to read "Irene Yang", is written over a horizontal line.

Irene Yang